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June 22, 1999

VIA COURIER

Magalie Roman Salas, Secretary
Federal Communications Commission
Portals II
445 12th Street, N.W.
Suite TW-A325
Washington, D.C. 20554

RECEIVED
JUN 22 1999
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: WinStar Wireless Inc.'s IntraLATA Toll Dialing Parity Implementation Plans,
File No. NSD-L-98-121, CC Docket 96-98

Dear Ms. Salas:

Pursuant to the Federal Communications Commission's ("Commission") June 18, 1999 Public Notice,¹ enclosed for filing with the Commission ("Commission") are an original and four (4) copies of this letter along with WinStar Wireless, Inc.'s ("WinStar") IntraLATA Toll Dialing Parity Implementation Plans for the states of Arizona, California, Georgia, Indiana, Massachusetts, New Hampshire, New Jersey, New Mexico, Ohio, Rhode Island, and Utah. These states have not yet taken action on these plans. Consequently, the plans are being filed with the Commission in order to conform with the Commission's Order directing local exchange carriers ("LECs") to file their plans with the Commission on June 22, 1999 if a state commission has not yet acted on a LEC's intraLATA toll dialing parity implementation plan.²

No. of Copies rec'd 014
List A B C D E

¹ Instructions for Filing IntraLATA Toll Dialing Parity Plans, DA 99-1190, *Public Notice*, (June 18, 1999).

² Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, CC Docket 96-98, NSD File No. L-98-121, *Order*, FCC 99-54 para. 7 (rel. Mar. 23, 1999).

Magalie Roman Salas
June 22, 1999
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Kindly date-stamp the extra copy of this filing and return it to us. Thank you for your attention to this matter. Should you have any questions, do not hesitate to contact John Beahn at (202) 945-6947.

Sincerely,

A handwritten signature in black ink, appearing to read "Kathy Cooper", with a long horizontal flourish extending to the right.

Russell M. Blau
Kathy Cooper
Counsel for WinStar Wireless, Inc.

Enclosures

cc: Al McCloud, FCC (2 copies, w/ enclosures)
Eleanor Willis

EXHIBIT LIST

Exhibit A - WinStar Wireless, Inc.'s Arizona Dialing Parity Plan

Exhibit B - WinStar Wireless, Inc.'s California Toll Dialing Parity Plan

Exhibit C - WinStar Wireless of Georgia, LLC's Toll Dialing Parity Plan

Exhibit D - WinStar Wireless of Indiana, LLC Toll Dialing Parity Plan

Exhibit E - WinStar Wireless, Inc.'s Massachusetts Toll Dialing Parity Plan

Exhibit F - WinStar Wireless, Inc.'s New Hampshire Toll Dialing Parity Plan

Exhibit G - WinStar Wireless of New Jersey, LLC's Toll Dialing Parity Plan

Exhibit H - WinStar Wireless, Inc.'s New Mexico Toll Dialing Parity Plan

Exhibit I - WinStar Wireless, Inc.'s Ohio Revised Tariff Pages

Exhibit J - WinStar Wireless, Inc.'s Rhode Island Toll Dialing Parity Plan

Exhibit K - WinStar Wireless, Inc.'s Utah Toll Dialing Parity Plan

Exhibit A - WinStar Wireless, Inc.'s Arizona Dialing Parity Plan

**BEFORE THE
CORPORATION COMMISSION OF THE
STATE OF ARIZONA**

**WinStar Wireless, Inc.
Dialing Parity Plan**

INTRODUCTION

WinStar Wireless, Inc. ("WinStar") will initiate the process that will give end user customers the opportunity to designate a carrier for their intraLATA toll call traffic in those market areas where WinStar is a facility based local exchange service provider. IntraLATA toll calls will automatically be directed to the designated carrier without the customer having to dial an access code.

GENERAL INFORMATION

WinStar will deploy two PIC (Primary Interexchange Carrier) technology in its switches. This technology will enable the customer to presubscribe to the same or a different carrier for their intraLATA and/or interLATA service. WinStar will offer customers the ability to access all participating carriers by dialing the appropriate access code (10XXX/101XXXX). WinStar will revise and file all appropriate tariffs in accordance with this Plan.

All eligible WinStar end user telephone line numbers will be presubscribed and must have a PIC associated with them.

CARRIER INFORMATION

Carriers will have the option of offering intraLATA service only or intraLATA and interLATA service. WinStar will notify potential carriers sixty days prior to the initial availability of presubscription in

specific market areas. Carriers will have the option of participating in all market areas or in a specific market area.

Carriers will be required to return a completed Non-Disclosure Agreement and Participation Agreement(s). These documents will be provided to carriers as part of the WinStar carrier correspondence process.

WinStar will not participate in billing disputes for intraLATA service between alternative competing carriers and their customers.

Carriers wishing to participate will be requested to submit Access Service Requests/ Translation Questionnaires to the Access Tandem owner and to WinStar.

NETWORK INFORMATION

All originating intraLATA traffic will initially be routed via the incumbent Local Exchange Carrier (LEC) Access Tandem(s). Following conversion, direct trunks between the WinStar switch and the carrier location(s) may be provisioned where traffic volumes warrant.

Carriers must have Feature Group D trunks in place between their point of presence and the incumbent LEC Access Tandem(s).

WinStar will route all originating intraLATA traffic to the designated carrier and will only block traffic at the request of the end user customer and/or in compliance with regulatory regulations. Requests from carriers to block traffic or to remove customers from their network will not be honored. Calls that cannot be completed to a carrier will be routed to an announcement.

CUSTOMER CONTACT INFORMATION

WinStar customer contact representatives will process customer initiated PIC selections to WinStar or to an alternative intraLATA carrier as designated by the customer. Carriers will have the option of allowing the WinStar representative to process PIC requests on their behalf.

Alternative carriers may submit PIC changes to WinStar via a fax/paper interface. Details regarding this process will be provided as part of WinStar's carrier correspondence.

WinStar will accept as a bona fide PIC a selection of "NO PIC" as a choice. "NO PIC" customers will have access code dialing capability to reach participating intraLATA carriers.

WinStar will provide customers with a confirmation notification of their PIC (WinStar or an alternative carrier) selection.

WinStar representatives will provide alternative carrier(s) names and contact telephone number (if provided by carrier) to customers in random order upon customer request. WinStar representatives will not discuss alternative carrier rates or services and will not provide customers with Carrier Identification Codes or access code dialing instructions.

WinStar representatives will not initiate or accept three way calls from alternative carriers to discuss presubscription.

PRESUBSCRIPTION INFORMATION

A five dollar PIC change charge will be incurred and billed to the customer for each eligible line where a PIC change is made.

In an effort to reduce unauthorized PIC changes, WinStar will offer intraLATA PIC Freeze service to all customers at no charge. PIC Freeze can only be initiated (or removed) by the customer requesting it through their WinStar representative.

Carriers will be required to submit PIC changes using the Customer Account Record Exchange (CARE) 960 byte format via paper medium. WinStar will provide carriers with PIC order confirmation and reject information using the CARE format. Specific details regarding CARE will be provided to participating carriers.

For customers who change their local service provider from the incumbent LEC to WinStar and retain their incumbent LEC telephone number(s), WinStar, as part of the CARE PIC process, will provide the selected intraLATA carrier with both the retained (incumbent LEC) telephone number and the WinStar telephone number.

Exhibit B - WinStar Wireless, Inc.'s California Toll Dialing Parity Plan

**BEFORE THE
PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA**

**WinStar Wireless, Inc.
Toll Dialing Parity Plan**

INTRODUCTION

WinStar Wireless, Inc. ("WinStar") will initiate the process that will give end user customers the opportunity to designate a carrier for their intraLATA toll call traffic in those market areas where WinStar is a facility based local exchange service provider. IntraLATA toll calls will automatically be directed to the designated carrier without the customer having to dial an access code.

GENERAL INFORMATION

WinStar will deploy two PIC (Primary Interexchange Carrier) technology in its switches. This technology will enable the customer to presubscribe to the same or a different carrier for their intraLATA and/or interLATA service. WinStar will offer customers the ability to access all participating carriers by dialing the appropriate access code (10XXX/101XXX). WinStar will revise and file all appropriate tariffs in accordance with this Plan.

All eligible WinStar end user telephone line numbers will be presubscribed and must have a PIC associated with them.

CARRIER INFORMATION

Carriers will have the option of offering intraLATA service only or intraLATA and interLATA service. WinStar will notify potential carriers sixty days prior to the initial availability of presubscription in

specific market areas. Carriers will have the option of participating in all market areas or in a specific market area.

Carriers will be required to return a completed Non-Disclosure Agreement and Participation Agreement(s). These documents will be provided to carriers as part of the WinStar carrier correspondence process.

WinStar will not participate in billing disputes for intraLATA service between alternative competing carriers and their customers.

Carriers wishing to participate will be requested to submit Access Service Requests/ Translation Questionnaires to the Access Tandem owner and to WinStar.

NETWORK INFORMATION

All originating intraLATA traffic will initially be routed via the incumbent Local Exchange Carrier (LEC) Access Tandem(s). Following conversion, direct trunks between the WinStar switch and the carrier location(s) may be provisioned where traffic volumes warrant.

Carriers must have Feature Group D trunks in place between their point of presence and the incumbent LEC Access Tandem(s).

WinStar will route all originating intraLATA traffic to the designated carrier and will only block traffic at the request of the end user customer and/or in compliance with regulatory regulations. Requests from carriers to block traffic or to remove customers from their network will not be honored. Calls that cannot be completed to a carrier will be routed to an announcement.

CUSTOMER CONTACT INFORMATION

WinStar customer contact representatives will process customer initiated PIC selections to WinStar or to an alternative intraLATA carrier as designated by the customer. Carriers will have the option of allowing the WinStar representative to process PIC requests on their behalf.

Alternative carriers may submit PIC changes to WinStar via a fax/paper interface. Details regarding this process will be provided as part of WinStar's carrier correspondence.

WinStar will accept as a bona fide PIC a selection of "NO PIC" as a choice. "NO PIC" customers will have access code dialing capability to reach participating intraLATA carriers.

WinStar will provide customers with a confirmation notification of their PIC (WinStar or an alternative carrier) selection.

WinStar representatives will provide alternative carrier(s) names and contact telephone number (if provided by carrier) to customers in random order upon customer request. WinStar representatives will not discuss alternative carrier rates or services and will not provide customers with Carrier Identification Codes or access code dialing instructions.

WinStar representatives will not initiate or accept three way calls from alternative carriers to discuss presubscription.

PRESUBSCRIPTION INFORMATION

A five dollar PIC change charge will be incurred and billed to the customer for each eligible line where a PIC change is made.

In an effort to reduce unauthorized PIC changes, WinStar will offer intraLATA PIC Freeze service to all customers at no charge. PIC Freeze can only be initiated (or removed) by the customer requesting it through their WinStar representative.

Carriers will be required to submit PIC changes using the Customer Account Record Exchange (CARE) 960 byte format via paper medium. WinStar will provide carriers with PIC order confirmation and reject information using the CARE format. Specific details regarding CARE will be provided to participating carriers.

For customers who change their local service provider from the incumbent LEC to WinStar and retain their incumbent LEC telephone number(s), WinStar, as part of the CARE PIC process, will provide the selected intraLATA carrier with both the retained (incumbent LEC) telephone number and the WinStar telephone number.

Exhibit C - WinStar Wireless of Georgia, LLC's Toll Dialing Parity Plan

**BEFORE THE
CORPORATION COMMISSION OF THE
STATE OF GEORGIA**

**WinStar Wireless of Georgia, LLC
Toll Dialing Parity Plan**

INTRODUCTION

WinStar Wireless of Georgia, LLC ("WinStar") will initiate the process that will give end user customers the opportunity to designate a carrier for their intraLATA toll call traffic in those market areas where WinStar is a facility based local exchange service provider. IntraLATA toll calls will automatically be directed to the designated carrier without the customer having to dial an access code.

GENERAL INFORMATION

WinStar will deploy two PIC (Primary Interexchange Carrier) technology in its switches. This technology will enable the customer to presubscribe to the same or a different carrier for their intraLATA and/or interLATA service. WinStar will offer customers the ability to access all participating carriers by dialing the appropriate access code (10XXX/101XXXX). WinStar will revise and file all appropriate tariffs in accordance with this Plan.

All eligible WinStar end user telephone line numbers will be presubscribed and must have a PIC associated with them.

CARRIER INFORMATION

Carriers will have the option of offering intraLATA service only or intraLATA and interLATA service. WinStar will notify potential carriers sixty days prior to the initial availability of presubscription in

specific market areas. Carriers will have the option of participating in all market areas or in a specific market area.

Carriers will be required to return a completed Non-Disclosure Agreement and Participation Agreement(s). These documents will be provided to carriers as part of the WinStar carrier correspondence process.

WinStar will not participate in billing disputes for intraLATA service between alternative competing carriers and their customers.

Carriers wishing to participate will be requested to submit Access Service Requests/ Translation Questionnaires to the Access Tandem owner and to WinStar.

NETWORK INFORMATION

All originating intraLATA traffic will initially be routed via the incumbent Local Exchange Carrier (LEC) Access Tandem(s). Following conversion, direct trunks between the WinStar switch and the carrier location(s) may be provisioned where traffic volumes warrant.

Carriers must have Feature Group D trunks in place between their point of presence and the incumbent LEC Access Tandem(s).

WinStar will route all originating intraLATA traffic to the designated carrier and will only block traffic at the request of the end user customer and/or in compliance with regulatory regulations. Requests from carriers to block traffic or to remove customers from their network will not be honored. Calls that cannot be completed to a carrier will be routed to an announcement.

CUSTOMER CONTACT INFORMATION

WinStar customer contact representatives will process customer initiated PIC selections to WinStar or to an alternative intraLATA carrier as designated by the customer. Carriers will have the option of allowing the WinStar representative to process PIC requests on their behalf.

Alternative carriers may submit PIC changes to WinStar via a fax/paper interface. Details regarding this process will be provided as part of WinStar's carrier correspondence.

WinStar will accept as a bona fide PIC a selection of "NO PIC" as a choice. "NO PIC" customers will have access code dialing capability to reach participating intraLATA carriers.

WinStar will provide customers with a confirmation notification of their PIC (WinStar or an alternative carrier) selection.

WinStar representatives will provide alternative carrier(s) names and contact telephone number (if provided by carrier) to customers in random order upon customer request. WinStar representatives will not discuss alternative carrier rates or services and will not provide customers with Carrier Identification Codes or access code dialing instructions.

WinStar representatives will not initiate or accept three way calls from alternative carriers to discuss presubscription.

PRESUBSCRIPTION INFORMATION

A five dollar PIC change charge will be incurred and billed to the customer for each eligible line where a PIC change is made.

In an effort to reduce unauthorized PIC changes, WinStar will offer intraLATA PIC Freeze service to all customers at no charge. PIC Freeze can only be initiated (or removed) by the customer requesting it through their WinStar representative.

Carriers will be required to submit PIC changes using the Customer Account Record Exchange (CARE) 960 byte format via paper medium. WinStar will provide carriers with PIC order confirmation and reject information using the CARE format. Specific details regarding CARE will be provided to participating carriers.

For customers who change their local service provider from the incumbent LEC to WinStar and retain their incumbent LEC telephone number(s), WinStar, as part of the CARE PIC process, will provide the selected intraLATA carrier with both the retained (incumbent LEC) telephone number and the WinStar telephone number.

Exhibit D - WinStar Wireless of Indiana, LLC Toll Dialing Parity Plan

**BEFORE THE
UTILITY REGULATORY COMMISSION OF THE
STATE OF INDIANA**

**WinStar Wireless of Indiana, LLC
Toll Dialing Parity Plan**

INTRODUCTION

WinStar Wireless of Indiana, LLC ("WinStar") will initiate the process that will give end user customers the opportunity to designate a carrier for their intraLATA toll call traffic in those market areas where WinStar is a facility based local exchange service provider. IntraLATA toll calls will automatically be directed to the designated carrier without the customer having to dial an access code.

GENERAL INFORMATION

WinStar will deploy two PIC (Primary Interexchange Carrier) technology in its switches. This technology will enable the customer to presubscribe to the same or a different carrier for their intraLATA and/or interLATA service. WinStar will offer customers the ability to access all participating carriers by dialing the appropriate access code (10XXX/101XXXX). WinStar will revise and file all appropriate tariffs in accordance with this Plan.

All eligible WinStar end user telephone line numbers will be presubscribed and must have a PIC associated with them.

CARRIER INFORMATION

Carriers will have the option of offering intraLATA service only or intraLATA and interLATA service. WinStar will notify potential carriers sixty days prior to the initial availability of presubscription in

specific market areas. Carriers will have the option of participating in all market areas or in a specific market area.

Carriers will be required to return a completed Non-Disclosure Agreement and Participation Agreement(s). These documents will be provided to carriers as part of the WinStar carrier correspondence process.

WinStar will not participate in billing disputes for intraLATA service between alternative competing carriers and their customers.

Carriers wishing to participate will be requested to submit Access Service Requests/ Translation Questionnaires to the Access Tandem owner and to WinStar.

NETWORK INFORMATION

All originating intraLATA traffic will initially be routed via the incumbent Local Exchange Carrier (LEC) Access Tandem(s). Following conversion, direct trunks between the WinStar switch and the carrier location(s) may be provisioned where traffic volumes warrant.

Carriers must have Feature Group D trunks in place between their point of presence and the incumbent LEC Access Tandem(s).

WinStar will route all originating intraLATA traffic to the designated carrier and will only block traffic at the request of the end user customer and/or in compliance with regulatory regulations. Requests from carriers to block traffic or to remove customers from their network will not be honored. Calls that cannot be completed to a carrier will be routed to an announcement.

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For customers who change their local service provider from the incumbent LEC to WinStar and retain their incumbent LEC telephone number(s), WinStar, as part of the CARE PIC process, will provide the selected intraLATA carrier with both the retained (incumbent LEC) telephone number and the WinStar telephone number.

**Exhibit E - WinStar Wireless, Inc.'s Massachusetts Toll Dialing Parity
Plan**

**BEFORE THE
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY OF THE
STATE OF MASSACHUSETTS**

**WinStar Wireless, Inc.
Toll Dialing Parity Plan**

INTRODUCTION

WinStar Wireless, Inc. ("WinStar") will initiate the process that will give end user customers the opportunity to designate a carrier for their intraLATA toll call traffic in those market areas where WinStar is a facility based local exchange service provider. IntraLATA toll calls will automatically be directed to the designated carrier without the customer having to dial an access code.

GENERAL INFORMATION

WinStar will deploy two PIC (Primary Interexchange Carrier) technology in its switches. This technology will enable the customer to presubscribe to the same or a different carrier for their intraLATA and/or interLATA service. WinStar will offer customers the ability to access all participating carriers by dialing the appropriate access code (10XXX/101XXXX). WinStar will revise and file all appropriate tariffs in accordance with this Plan.

All eligible WinStar end user telephone line numbers will be presubscribed and must have a PIC associated with them.

CARRIER INFORMATION

Carriers will have the option of offering intraLATA service only or intraLATA and interLATA service. WinStar will notify potential carriers sixty days prior to the initial availability of presubscription in